In regards to CG Docket 10-51, and the filing by the FCC of 11-Jun-10, number FCC 10-88, I would like to pose the question:

If all training, software and security implementations are equal in all call centres in a company, how does the location of the centre (example: located in Canada where ASL and English are used for CAs) have any relevance to instances of fraud?

It is the responsibility of the VRS company to ensure fraudulent minutes are not billed to the FCC regardless of the location of call centres. Many providers do not have call centres outside of the U.S. yet have participated in billing the FCC for minutes where neither leg of the call was on U.S. soil. Again, I emphasize, these providers do not have VRS call centres outside of the U.S.